

ISABELLE L. ORD (Bar No. 198224)
isabelle.ord@us.dlapiper.com
ELIZABETH C. CALLAHAN (Bar No. 323510)
elizabeth.callahan@us.dlapiper.com
DLA PIPER LLP (US)
555 Mission Street, Suite 2400
San Francisco, CA 94105-2933
Tel: 415.836.2500

Alex R. Straus, Esq. (Bar No. 321366)
alex@milberg.com
**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**
280 S. Beverly Drive, Suite PH
Beverly Hills, CA 90212
Tel: 865.247.00080

CHRISTOPHER M. YOUNG (Bar No. 163319)
christopher.young@us.dlapiper.com
ALEXANDER E. WOLF (Bar No. 299775)
alexander.wolf@us.dlapiper.com
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101
Tel: 619.699.2700

Charles J Crueger, Esq. (*pro hac vice*)
cjc@cruegerdickinson.com
Ben Kaplan, Esq. (*pro hac vice*)
bak@cruegerdickinson.com
CRUEGER DICKINSON LLC
4532 North Oakland Avenue
Whitefish Bay, WI 53211
T: (414) 210-3868

Attorneys for Defendant
TTE TECHNOLOGY, INC.

Attorneys for PLAINTIFFS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MARK PACANA, PAUL FISKRATTI, and
WAYNE LEWALD, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

TTE TECHNOLOGY, INC., dba TCL NORTH
AMERICA,

Defendant.

CASE NO. 3:20-CV-02857-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
THE PARTIES' RESPONSE TO ORDER
RE SUPPLEMENTAL BRIEFING
AND/OR EVIDENCE**

Judge: Hon. Edward M. Chen
Crtrm: 5 – 17th Floor

1 Plaintiffs Mark Pacana, Paul Fiskratti, and Wayne Lewald (collectively, “Plaintiffs”) and
2 Defendant TTE Technology Inc. dba TCL North America (“TCL”), by and through their
3 respective counsel of record, hereby stipulate and agree to the following, subject to Court
4 approval:

5 WHEREAS, Plaintiffs filed their Motion for Preliminary Approval of Class Settlement and
6 Direction of Notice Under Fed. R. Civ. P. 23(e) (Doc. 120) (the “Motion”) on February 15, 2022,
7 and Defendant filed its Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of
8 Class Settlement (Doc. 121) on March 1, 2022;

9 WHEREAS, on March 31, 2022, the Court ordered the parties to provide “Supplemental
10 Briefing and/or Evidence” on various aspects of the Settlement Agreement and the corresponding
11 Notice Plan (Doc. 125) (the “Order”) by April 7, 2022;

12 WHEREAS, the Court will hold a hearing on the Motion on April 21, 2022, and the parties
13 will provide a status report by April 14, 2022 (Doc. 124);

14 WHEREAS, the parties are in the process of meeting and conferring on this the issues the
15 Court raised, including but not limited to discussing potential modifications to the Settlement
16 Agreement; and

17 WHEREAS, the parties have also contacted both the class administrator as well as the
18 mediator, Hon. Judge Gandhi (Ret.) of JAMS to assist in working through the Order’s issues and
19 questions, but anticipate that additional time will be necessary to fully respond to the Order;

20 THEREFORE, the parties request one additional week, until April 14, 2022, to respond to
21 the Order.

1 Dated: April 5, 2022

DLA PIPER LLP (US)

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3 By: /s/ Isabelle L. Ord

4 ISABELLE L. ORD
5 CHRISTOPHER M. YOUNG
Attorneys for Defendant
TTE TECHNOLOGY, INC.

6 Dated: April 5, 2022

CRUEGER DICKINSON LLC

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8 By: /s/ Charles Crueger¹

9 CHARLES J. CRUEGER
10 BEN KAPLAN
11 GREG G. COLEMAN
Attorneys for Plaintiffs
12 CHRISTOPHER JULIAN, MARK PACANA,
PAUL FISKRATTI, and WAYNE LEWALD

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28 ¹ Pursuant to N.D. Cal. Civ. L.R. 5-1(i)(3), I hereby attest that the concurrence to the filing of this document has been obtained from each signatory hereto.

[PROPOSED] ORDER

Having considered the parties' Stipulation, and good cause appearing therefore, the Court hereby GRANTS the parties' Stipulation. It is HEREBY ORDERED that the response to the Order Re Supplemental Briefing and/or Evidence shall be due no later than April 14, 2022.

IT IS SO ORDERED.

Dated: _____

The Honorable Edward M. Chen
United States District Judge